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Raj Abhyanker

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 NEXTDOOR.COM, INC., a Delaware
corporation,

13 Plaintiff,

14 vs.

15 RAJ ABHYANKER, an individual,

16 Defendant.

Case No. 3:12-cv-05667-EMC

**DECLARATION OF RAJ ABHYANKER
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

Date: February 20, 2014

Time: 1:30 p.m.

Courtroom: 5 – 17th Floor

Judge: Honorable Edward M. Chen

17 RAJ ABHYANKER, an individual

18 Counterclaimant,

19 vs.

20 NEXTDOOR.COM, INC., a Delaware
corporation; PRAKASH
21 JANAKIRAMAN, an individual;
22 BENCHMARK CAPITAL PARTNERS,
L.P., a Delaware limited partnership;
23 BENCHMARK CAPITAL
MANAGEMENT CO. LLC, a Delaware
24 limited liability company; SANDEEP
SOOD, an individual; MONSOON
25 ENTERPRISES, INC., a California
corporation, and DOES 1–50, inclusive;

26 Counterdefendants.
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1 I, RAJ ABHYANKER, declare as follows:

2 1. I am the Defendant and Counterclaimant in this lawsuit. I make this Declaration in
3 support of Nextdoor.com, Inc. and Prakash Janakiraman's Administrative Motion to Seal Exhibit
4 Z to the Kelly Reply Declaration (Doc. 155), filed on January 30, 2014. The matters set forth
5 herein are of my own personal knowledge, and if called upon to testify as to such matters, I could
6 and would do so.

7 2. Exhibit Z to the Kelly Reply Declaration consist of pages from the Due Diligence
8 CD that I provided to Benchmark in 2007. The CD was produced as "attorney's eyes only" in
9 this litigation.

10 3. I understand that at the Case Management Conference on December 12, 2013,
11 Counsel for Nextdoor.com agreed to treat the CD as "attorney's eyes only," if it were to be
12 produced in this action.

13 4. I provided that CD to Benchmark only after Benchmark agreed to maintain its
14 confidentiality. The CD was marked "confidential."

15 5. The pages that constitute Exhibit Z include business development plans and
16 strategies, including advertising and promotion ideas and plans, and mock-ups of webpages. That
17 information has not been made available to the general public. It has only been provided
18 confidentially to persons who were subject to non-disclosure agreements.

19 6. I would be harmed if that information were to be made public. I am in the process
20 of re-building and re-launching Fatdoor. The confidential information in the CD that I provided
21 to Benchmark, is relevant to my Fatdoor re-launch.

22
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Executed February 6, 2014 at Mountain View, California.
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Raj Abhyanker

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